

LAFAYETTE & KUMAGAI LLP  
ATTORNEYS AT LAW  
101 MISSION STREET, SUITE 600  
SAN FRANCISCO, CALIFORNIA 94105  
(415) 357-4600  
FAX (415) 357-4605

LAFAYETTE & KUMAGAI LLP  
GARY T. LAFAYETTE (State Bar No. 88666)  
Email: [glafayette@lkclaw.com](mailto:glafayette@lkclaw.com)  
SUSAN T. KUMAGAI (State Bar No. 127667)  
Email: [skumagai@lkclaw.com](mailto:skumagai@lkclaw.com)  
AFRICA E. DAVIDSON (State Bar No. 225680)  
Email: [adavidson@lkclaw.com](mailto:adavidson@lkclaw.com)  
101 Mission Street, Suite 600  
San Francisco, California 94105  
Telephone: (415) 357-4600  
Facsimile: (415) 357-4605

*Attorneys for Defendants*  
CITY OF OAKLAND and DEANNA SANTANA

UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

DARYELLE LAWANNA PRESTON,

Plaintiff,

v.

CITY OF OAKLAND; DEANNA  
SANTANA, in her individual capacity; and  
DOES 1 through 10, inclusive,

Defendants.

Case No. 3:14-cv-02022 NC

Complaint Filed: 3/7/2014

**DEFENDANT'S AMENDED TRIAL  
WITNESS LIST**

Final Pretrial Conference Date:

August 19, 2015

Time: 11:00 a.m.

Courtroom: D (San Francisco)

Magistrate Judge: Nathanael M. Cousins

Defendants City of Oakland (the "City") and Deanna Santana ("Santana"), in accordance with the Court's Order Setting Further Pretrial Dates dated August 20, 2015, submit the following Amended Trial Witness List in connection with the above captioned matter.

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| No. | Witness               | Subject of Testimony  | Time Estimate<br>for Direct<br>Examination | Time Estimate<br>for Cross<br>Examination |
|-----|-----------------------|---|--|---|
| 1   | Winnie Anderson       | Plaintiff's alleged protected acts; union negotiations and agreements; plaintiff's work with unions               | 30 minutes                                 | 15 minutes                                |
| 2   | Fred Blackwell        | Plaintiff's alleged protected acts; the Rainbow Teen Center Report and City Council meeting on March 6, 2012      | 10 minutes                                 | 10 minutes                                |
| 3   | Barry Donelan         | Plaintiff's alleged protected acts; plaintiff's job performance; union negotiations; plaintiff's work with unions | 5 minutes                                  | 5 minutes                                 |
| 4   | Trinette Gist-Skinner | Plaintiff's alleged protected acts; facts regarding negotiations with Local 55 and tentative agreements           | 20 minutes                                 | 10 minutes                                |
| 5   | Andrea Gouridine      | Legitimate business reasons for termination; conduct during investigations  | 10 minutes                                 | 10 minutes                                |
| 6   | Donna Hom             | Union negotiations; Local 55 tentative agreements   | 10 minutes                                 | 5 minutes                                 |
| 7   | Scott Johnson         | Plaintiff's job performance   | 10 minutes                                 | 10 minutes                                |
| 8   | Howard Jordan         | Plaintiff's alleged protected acts; plaintiff's work with unions  | 10 minutes                                 | 5 minutes                                 |
| 9   | Katano Kasaine        | Plaintiff's alleged protected acts; SEIU negotiations and grievance   | 40 minutes                                 | 20 minutes                                |

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| No. | Witness             | Subject of Testimony  | Time Estimate for Direct Examination | Time Estimate for Cross Examination |
|-----|---------------------|---|--------------------------------------|-------------------------------------|
| 10  | Sonia Lara          | Plaintiff's alleged protected acts; union negotiations, agreements and grievance; plaintiff's work with unions; investigations  | 30 minutes                           | 15 minutes                          |
| 11  | Dwight McElroy      | Union negotiations; SEIU grievance; plaintiff's work with unions  | 5 minutes                            | 5 minutes                           |
| 12  | Alexandra Orologas  | Legitimate business reasons for termination; process for agenda to City Council; plaintiff's dissemination of confidential information; plaintiff's conduct relating to City Council meetings | 10 minutes                           | 10 minutes                          |
| 13  | Barbara Parker      | Rainbow Teen Center Report; SEIU grievance; Local 55 tentative agreements   | 5 minutes                            | 20 minutes                          |
| 14  | Lawanna Preston     | Alleged protected acts; job description; job performance; legitimate business reasons for termination   | 1 hour                               | 1 hour                              |
| 15  | Jean Quan           | Legitimate business reasons for termination; causation  | 10 minutes                           | 5 minutes                           |
| 16  | Teresa DeLoach Reed | Local 55 negotiations and tentative agreements  | 10 minutes                           | 10 minutes                          |
| 17  | Dan Robertson       | Plaintiff's alleged protected acts; plaintiff's job performance; union negotiations   | 5 minutes                            | 5 minutes                           |
| 18  | Arturo Sanchez      | Plaintiff's termination   | 5 minutes                            | 5 minutes                           |

| No. | Witness        | Subject of Testimony   | Time Estimate<br>for Direct<br>Examination | Time Estimate<br>for Cross<br>Examination |
|-----|----------------|--|--|---|
| 19  | Deanna Santana | Legitimate business reasons<br>for termination; plaintiff's<br>alleged protected acts;<br>dissemination of<br>confidential information;<br>causation | 1 hour                                     | ½ hour                                    |
| 20  | Kip Walsh      | Drafting and signing of<br>Rainbow Teen Center<br>Report   | 10 minutes                                 | 5 minutes                                 |

Respectfully Submitted,

DATED: August 26, 2015

LAFAYETTE & KUMAGAI LLP

/s/ Gary T. Lafayette

GARY T. LAFAYETTE

Attorneys for Defendants

CITY OF OAKLAND and DEANNA SANTANA

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